



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Peter E. Brereton, Treasurer
Keycorp Political Action Committee
(FKA: Society Corporation Pac)
127 Public Square 7th Floor
Cleveland, OH 44114

JAN 13 1999

Identification Number: C00073155

Reference: October Quarterly Report (7/1/98-9/30/98)

Dear Mr. Brereton:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-You must attempt to obtain the full name, mailing address, occupation and name of employer for all individuals who contribute more than \$200 in a calendar year. Please amend your report to include the omitted information.

A committee may establish "best efforts" by providing the Commission with a description of its procedures for requesting the information. It is also in the best interests of the committee to provide a copy of its solicitation. In order to establish "best efforts", the committee must demonstrate that it makes at least one request for the information after the contribution is received. This one request must be made for any solicited or unsolicited contribution that, in the aggregate, exceeds the \$200 threshold and lacks the necessary information.

Each solicitation must include a clear and conspicuous request for the information. If a committee receives a contribution that, in the aggregate, exceeds the \$200 threshold but lacks contributor information, the committee must, within 30 days, make a written or oral request for the information. Please note that a written request may not include an additional solicitation or material on any other subject, other than thanking the contributor for the

donation, and must include a pre-addressed return post card or envelope for the contributor's response. An oral request must be documented in writing. Committees must also disclose information that was not provided by the contributor, but is available in any of the committee's records for that current election cycle.

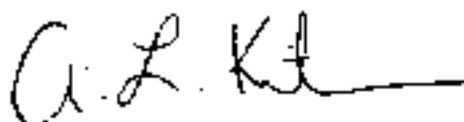
If a committee receives contributor information after the contributions have been reported, the committee shall either a) file with its next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before its next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.3(a)(4)(i) and 11 CFR § 104.7)

-Redesignations are reported as memo entries on Schedule B of the report covering the period in which the redesignation is made. Furthermore, it should occur within 60 days of the original contribution 11CFR§110.2(b)(5)(ii)(B) and include the amount and date of the original contribution, as well as the amount and date the redesignation is made. Schedule B of your report (pertinent portion(s) attached), however, does not disclose the amount or date of the redesignation(s). Please amend your report accordingly.

-Schedule B supporting Line 29 discloses a \$500.00 contribution to *People for Berryman*. Please be advised that contributions to federal candidates and political committees should be itemized on a separate Schedule B supporting Line 23 of the Detailed Summary Page. Line 29 is to be used when making contributions to non-federal candidates and committees.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,



Antoinette L. Kitchen
Reports Analyst
Reports Analysis Division

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

PAGE 4 OF 4

FOR LINE NUMBER 23

Contributions to Federal Candidates/Committees

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in full)
KeyCorp Political Action Committee

Full Name, Mailing Address and ZIP Code Sweeney for Congress Committee P.O. Box 4137 Clifton Park, NY 12065	Purpose of Disbursement Contribution: John E. Sweeney (NY-22-R) Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1998	Date (month, day, year) 9/28/98	Amount of Each Disbursement This Period \$1,000.00
Full Name, Mailing Address and ZIP Code Volunteers for Vento P.O. Box 65254 St. Paul, MN 55165	Purpose of Disbursement Contribution: Bruce F. Vento (MN-4-D) Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1998	Date (month, day, year) 7/22/98	Amount of Each Disbursement This Period \$500.00
Full Name, Mailing Address and ZIP Code Victory in Ohio Susan Scheutou 430 S. Capitol Street, SE Washington, DC 20003	Purpose of Disbursement Contribution: Victory in Ohio Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1998	Date (month, day, year) 7/17/98	Amount of Each Disbursement This Period \$2,000.00

B. Full Name, Mailing Address and ZIP Code Baker for Congress P.O. Box 1694 Baton Rouge, LA 70821	Purpose of Disbursement redesignation Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) 1998	Date (month, day, year) 5/12/98	Amount of Each Disbursement This Period 0.00
C. Full Name, Mailing Address and ZIP Code Baker for Congress P.O. Box 1694 Baton Rouge, LA 70821	Purpose of Disbursement redesignation Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) 1998	Date (month, day, year) 9/14/98	Amount of Each Disbursement This Period 0.00

SUBTOTAL of Disbursements This Page (optional)	\$3,500.00
TOTAL This Period (last page this line number only)	\$22,750.00

